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October 18, 2024

VIA CM/ECF ONLY

Hon. Mitchell J. Katz
U.S. Magistrate Judge
U.S. District Court, Northern District of New York
100 S. Clinton Street
Syracuse, New York 13261

RE: COMPAGNI v. TOWN OF CORTLANDVILLE, ET AL
Case No : 5:20-CV-00489 – GTS-ATB

Dear Judge Katz:

Please let this serve as a joint request on behalf of the plaintiff and defendants for a thirty (30) day extension of the remaining deadlines so that the parties can have additional time to complete depositions of expert witnesses.

Specifically, by text order dated on July 31, 2024, Your Honor, among other things, ordered expert depositions to be completed by October 27, 2024 and dispositive motions to be filed by December 27, 2024. Further, a status conference was scheduled for October 30, 2024. The parties have exchanged expert disclosure and have diligently been trying to schedule accounting and engineering experts on each side for depositions. However, due to the schedules of counsel and the experts, the earliest dates that we have been able to select are in November.

Accordingly, we respectfully request a thirty (30) day extension of the deadlines to accommodate completion of the depositions in November. Specifically, we request extensions as follows:

1. November 27, 2024 – deadline to complete expert depositions;
2. January 27, 2025 – deadline to file dispositive motions.

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We would request that the conference set for October 30, 2024 remain as scheduled. Thank you for your consideration. The parties are available to discuss this request with Your Honor if necessary.

Respectfully Submitted,

NASH CONNORS, P.C.

/s/ Philip M. Gulisano

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cc. Jesse Ryder, Esq. (via CM/ECF only)